

MARIO N. ALIOTO, ESQ. (56433)  
LAUREN C. CAPURRO, ESQ. (241151)  
TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP  
2001 Union Street, Suite 482  
San Francisco, CA 94123  
Telephone: (415) 563-7200  
Facsimile: (415) 346-0679  
E-mail: malioto@tatp.com  
lauren russell@tatp.com

*Lead Counsel for the Indirect-Purchaser Plaintiffs*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

IN RE CATHODE RAY TUBE (CRT)	)	MDL NO. 1917
ANTITRUST LITIGATION	)	
_____	)	Case No. 07-cv-5944-JST
	)	
This Document Relates to:	)	<b>DECLARATION OF GERARD A.</b>
	)	<b>DEVER IN SUPPORT OF INDIRECT</b>
Indirect Purchaser Class Action	)	<b>PURCHASER PLAINTIFFS' RESPONSE</b>
	)	<b>TO IRICO DEFENDANTS' MOTION IN</b>
	)	<b>LIMINE NO. 4</b>
	)	
	)	Hearing Date: December 15, 2023
	)	Time: 2:00 p.m.
	)	Courtroom: 6, 2nd Floor
	)	
_____	)	The Honorable Jon S. Tigar

I, Gerard A. Dever, hereby declare and state as follows:

1. I am a member of the law firm Fine, Kaplan and Black, R.P.C., counsel for the Indirect Purchaser Plaintiffs (“Plaintiffs”) in the above-captioned action currently pending in the U.S. District Court for the Northern District of California. I am a member in good standing of the bar of the Commonwealth of Pennsylvania and I am admitted *pro hac vice* to practice before this Court. I submit this Declaration in support of Plaintiffs’ Response to Irico Defendants’ Motion *in Limine* No. 4: to preclude the parties from conflating CNEIECC with any Irico entity.

2. Attached hereto as Exhibit 1 is a true and correct copy of a document produced in this litigation bearing Bates stamp IRI-CRT-00002041–2105 and its English translation. It was marked as deposition exhibit 8401.

3. Attached hereto as Exhibit 2 is a true and correct copy of a document produced in this litigation bearing Bates stamp IRI-CRT-00000956–1010 and its English translation. It was marked as deposition exhibit 8394.

4. Attached hereto as Exhibit 3 is a true and correct copy of Irico Defendants’ Supplemental Objections and Responses to Indirect Purchaser Plaintiffs’ Second Set of Interrogatories, No. 4, dated November 2, 2018.

5. Attached hereto as Exhibit 4 is a true and correct copy of a translation of a document produced in this litigation bearing Bates stamp IRI-CRT-00003498-99E. It was marked as deposition exhibit 8393.

6. Attached hereto as Exhibit 5 is a true and correct copy of a file produced in this litigation bearing Bates stamps IRI-CRT-00003546 and its English translation. It was marked as deposition exhibit 8413.

7. Attached hereto as Exhibit 6 is a true and correct copy of a document produced in this litigation bearing Bates stamp IRI-CRT-00003578-79E and its English translation. It was marked as deposition exhibit 8408.

1           8.       Attached hereto as Exhibit 7 is a true and correct copy of a file produced in this  
2 litigation bearing Bates stamp IRI-CRT-00003576-77E and its English translation. It was marked  
3 as deposition exhibit 8407.

4           9.       Attached hereto as Exhibit 8 is a true and correct copy of a document produced in  
5 this litigation bearing Bates stamp IRI-CRT-00003574 and its English translation.

6           10.      Attached hereto as Exhibit 9 is a true and correct copy of IRICO Group  
7 Electronics' 2010 Annual Report.

8           11.      Attached hereto as Exhibit 10 is a true and correct copy of a translation of a  
9 document produced in this litigation bearing Bates stamp IRI-CRT-00001154E.

10          12.      Attached hereto as Exhibit 11 is a true and correct copy of a translation of a  
11 document produced in this litigation bearing Bates stamp and IRI-CRT-00001155E.

12          13.      Attached hereto as Exhibit 12 is a true and correct copy of a document produced  
13 in this litigation bearing Bates stamp CHU00030303-04. It was marked as deposition exhibit  
14 8584.

15          14.      Attached hereto as Exhibit 13 is a true and correct copy of excerpts of the  
16 transcript of the deposition of Wang Zhaojie on September 21, 2022.

17          15.      Attached hereto as Exhibit 14 is a true and correct copy of a translation of a  
18 document produced in this litigation bearing Bates stamp IRI-CRT-00023923-24E and its  
19 English translation. It was marked as deposition exhibit 8586.

20          16.      Attached hereto as Exhibit 15 is a true and correct copy of a document produced  
21 in this litigation bearing Bates stamp CHU00016169-70. It was marked as deposition exhibit  
22 8587.

23          17.      Attached hereto as Exhibit 16 is a true and correct copy of a document produced  
24 in this litigation bearing Bates stamp IRI-CRT-00033206-09. It was marked as deposition exhibit  
25 8589.

26          18.      Attached hereto as Exhibit 17 is a true and correct copy of a *People's Daily* article  
27 dated November 20, 2000, and its English translation. It was marked as deposition exhibit 8396.

1           19. Attached hereto as Exhibit 18 is a true and correct copy of a document produced  
2 in this litigation bearing Bates stamp BMCC-CRT-000306758. It was marked as deposition  
3 exhibit 8590.

4           I declare under penalty of perjury under the laws of the United States that the foregoing is  
5 true and correct.

6           Executed on September 1, 2023, in Philadelphia, Pennsylvania.

7  
8 Dated: September 1, 2023

By: /s/ Gerard A. Dever

9 Gerard A. Dever  
10 Fine, Kaplan and Black, R.P.C.  
11 One South Broad Street, 23<sup>rd</sup> Floor  
12 Philadelphia, PA 19107  
13 Telephone: (215) 567-6565  
14 Facsimile: (215) 568-5872  
15 Email: gdever@finekaplan.com

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*Counsel for Indirect Purchaser Plaintiffs*